IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE

Global Force Entertainment, Inc. and Jeffrey Jarrett,)))
Plaintiffs,)
v.) Case No. 3:18-cv-00749
Anthem Wrestling Exhibitions, LLC,)
Defendant.))

DEFENDANT ANTHEM WRESTLING EXHIBITIONS, LLC'S MOTION TO SEAL

Pursuant to Section 5.07 of the Amended Practices and Procedures for Electronic Case Filing (Administrative Order 167-1), Defendant Anthem Wrestling Exhibitions, LLC ("Defendant" or "Anthem Wrestling"), by and through undersigned counsel, and for the reasons set out in Anthem's Memorandum of Fact and Law filed contemporaneously with this Motion, requests leave to file under seal Exhibits 1 and 2 to Anthem's Motion in Limine to Exclude the Expert Report of Glenn Perdue.

Anthem Wrestling Exhibitions, LLC, has filed a Motion in Limine to Exclude the Expert Report of Glenn Perdue. In support of that Motion, Anthem has attached to it as Exhibits 1 and 2 the Expert Report of Glenn Perdue and a collective exhibit of excerpts from his deposition. Anthem hereby moves for leave to file these two exhibits under seal. Anthem makes this request because the exhibits at issue contain sensitive financial information belonging to Anthem that would cause damage to it were it to be disclosed.

For the foregoing reasons and the reasons stated in Anthem's Memorandum of Fact and Law, Anthem Wrestling requests that its Motion to file under Seal be granted.

Respectfully Submitted,

BASS, BERRY & SIMS PLC

/s/ Paige W. Mills

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Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on June 5, 2020, I electronically filed the foregoing document with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to the following and/or served the following via U.S. Mail:

Samuel F. Miller Sara R. Ellis Hayley Hanna Baker Miller Legal Partners, PLLC Fifth Third Center – Suite 2000 424 Church Street Nashville, TN 37219

/s/ Paige W. Mills